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Counsel for Defendants

United States Bankruptcy Court
Northern District of Texas
Fort Worth Division

In re: Christopher Brandon Judge and Raquelle Ann
Judge, Debtors,

Kristin Newman, Plaintiff

v.

Christopher Brandon Judge and Raquelle Ann Judge,
Defendants

Case No. 23-41465-elm

Chapter 7

Adversary No. 23-04066

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

Defendants Christopher Brandon Judge and Raquelle Ann Judge (collectively, "Defendants" or "Debtors") file their Response to Plaintiff Kristin Newman's Motion for Summary Judgment, and would respectfully show the Court as follows:

1. Summary judgment is improper in this case because there are genuine issues of fact regarding Defendants' alleged fraud and misrepresentation.

2. Defendants set out their legal and factual grounds on which they rely in opposition to the motion more fully in their brief filed contemporaneously.

3. Defendants also set out their arguments and authorities in their brief.

Defendants Christopher Brandon Judge and Raquelle Ann Judge request that this Court deny the motion for summary judgment in its entirety.

DATED: January 20, 2025.

Respectfully submitted,

/s/ Clayton L. Everett
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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2025, a true and correct copy of the foregoing response has been served according to the Federal Rules of Civil Procedure, Federal Rules of Bankruptcy Procedure via electronic means, if available, to:

Counsel for Plaintiff via CM/ECF:

Michael Newman
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Plaintiff and Counsel via CM/ECF:

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/s/ Clayton L. Everett